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6 UNITED STATES DISTRICT COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON

8 MARIA GUTIERREZ,

9 Plaintiff,

10 v.

11 CITY OF ARLINGTON; MICHAEL
12 KNIGHT; JOSHUA FOX; and JOHN DOE
13 1-10 inclusive,

14 Defendants.

NO.

NOTICE OF REMOVAL

**(SNOHOMISH COUNTY SUPERIOR
COURT, CAUSE NO. 21-2-05386-31)**

15 Pursuant to 28 U.S.C. § 1443, and 28 U.S.C. § 1446, CITY OF ARLINGTON,
16 MICHAEL KNIGHT and JOSHUA FOX hereby remove the above-entitled action to the
17 United States District Court for the Western District of Washington at Seattle. Defendants
18 state:

19 1. The above-entitled action was filed in the Superior Court of Snohomish
20 County, Cause No. 21-2-05386-31. A true and correct copy of the Amended Complaint is
21 attached as Exhibit A.

22 2. Jurisdiction of this Court is based on 28 U.S.C. § 1331, 28 U.S.C. § 1343,
23 28 U.S.C. §1367, 28 U.S.C. §1441, and/or 28 U.S.C. §1443.

24 3. Plaintiff's *Amended Complaint* seeks damages and attorney's fees via 42
25 U.S.C. §1983 for alleged violation of civil rights protected by the Constitution and federal
26 law, and state law claims alleging violations of the Public Records Act, negligence and assault
27 & battery.

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1 4. Pursuant to 28 U.S.C. §1446(a), true and correct copies of all pleadings
2 previously served on Defendants City of Arlington, Michael Knight and Joshua Fox are
3 attached to counsel's verification.

4 5. Defendants reserve any and all affirmative defenses, including but not limited
5 to insufficient service of process.

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7 DATED: April 7, 2022

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9 KEATING, BUCKLIN & McCORMACK, INC., P.S.

10

11 By: /s/ Jeremy W. Culumber
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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: April 7, 2022

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